FILED
MAR 1 4 2006
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

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| UNITED STATES OF AMERICA | ) | |
| | ) | |
| VS. | ) | CR No. 06-003ML |
| | ) | |
| JAMAL NORTHUP | ) | |

# MOTION TO CONTINUE

Now comes the accused, Jamal Northup, by and through his counsel, and moves this Honorable Court to continue the proceedings in this matter for an additional thirty (30) days. Additionally, Mr. Northup moves that this period be excluded under the Speedy Trial Act 18 USC § 3161(h)(8). As grounds thereto, Mr. Northup reports that he has received the government's response to his Motion to Suppress Evidence in this matter which includes information, facts, and allegations not previously revealed in the police reports or other discovery items. Defense Counsel received the response on March 13, 2006, and reviewed the document overnight. The Defense needs this additional time to investigate this additional information, review it with Mr. Northup, and incorporate it into his defense.

Respectfully submitted
Jamal Northup
By his attorney,

[signature]

Kevin J. Fitzgerald
Assistant Federal Defender
10 Weybosset St., Ste. 300
Providence, RI 02903
(401) 528-4281

Granted. Thirty days are excluded for purposes of the Speedy Trial Act.
Mary M. Lisi USDJ
3/16/05

## CERTIFICATION

I hereby certify that I caused a copy of this Motion to be delivered to ~~Lee Vilker~~ Peter Neronha, Assistant United States Attorney, on ~~February~~ March 14, 2006.

[signature]

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